



HIGHLAND CAPITAL MANAGEMENT, L.P.,

Plaintiff,

vs.

HIGHLAND CAPITAL MANAGEMENT FUND  
ADVISORS, L.P.,

Defendant.

Adv. Proc. No. 21-03004-sgj

Case No. 3:21-cv-00881-X

HIGHLAND CAPITAL MANAGEMENT, L.P.,

Plaintiff,

vs.

NEXPOINT ADVISORS, L.P., JAMES  
DONDERO, NANCY DONDERO, AND  
THE DUGABOY INVESTMENT TRUST,

Defendants.

Adv. Proc. No. 21-03005-sgj

Case No. 3:21-cv-00881-X

HIGHLAND CAPITAL MANAGEMENT, L.P.,

Plaintiff,

vs.

HIGHLAND CAPITAL MANAGEMENT  
SERVICES, INC., JAMES DONDERO,  
NANCY DONDERO, AND THE DUGABOY  
INVESTMENT TRUST,

Defendants.

Adv. Proc. No. 21-03006-sgj

Case No. 3:21-cv-00881-X



Dated: August 5, 2022

**PACHULSKI STANG ZIEHL & JONES LLP**

Jeffrey N. Pomerantz (CA Bar No. 143717)  
John A. Morris (NY Bar No. 2405397)  
Gregory V. Demo (NY Bar No. 5371992)  
Hayley R. Winograd (NY Bar No. 5612569)  
10100 Santa Monica Blvd., 13th Floor  
Los Angeles, CA 90067  
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Facsimile: (310) 201-0760  
Email: jpomerantz@pszjlaw.com  
jmorris@pszjlaw.com  
gdemo@pszjlaw.com  
hwinograd@pszjlaw.com

-and-

**HAYWARD PLLC**

/s/ Zachery Z. Annable

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Texas Bar No. 24044908  
MHayward@HaywardFirm.com  
Zachery Z. Annable  
Texas Bar No. 24053075  
ZAnnable@HaywardFirm.com  
10501 N. Central Expy, Ste. 106  
Dallas, Texas 75231  
Tel: (972) 755-7100  
Fax: (972) 755-7110

*Counsel for Highland Capital Management, L.P.*



**EXHIBIT 1**

**DECLARATION OF JOHN A. MORRIS IN SUPPORT OF HIGHLAND CAPITAL  
MANAGEMENT L.P.'S PROPOSED FORM OF JUDGMENT**

I, John A. Morris, pursuant to **28 U.S.C. § 1746**, under penalty of perjury, declare as follows:

2. I am a partner in the law firm Pachulski, Stang, Ziehl & Jones LLP (the “Firm”), counsel to Highland Capital Management, L.P. (“Highland” or “Plaintiff”), the Reorganized Debtor in the above-captioned chapter 11 case (the “Bankruptcy Case”) and the plaintiff in the above-referenced adversary proceedings (each, a “Note Litigation,” and collectively, the “Notes Litigation”). I submit this Declaration in support of *Highland Capital Management, L.P.’s Proposed Forms of Judgment* (the “Proposed Judgments”).

3. I have overseen my Firm’s representation of Plaintiff in all aspects of the Notes Litigation. This Declaration is based on my personal knowledge and review of the documents listed below.

4. On July 19, 2022, the Bankruptcy Court rendered a *Report and Recommendation to District Court: Court Should Grant Plaintiff’s Motion for Partial Summary Judgment Against All Five Note Maker Defendants (With Respect to All Sixteen Promissory Notes) in the Above-Referenced Consolidated Note Actions* (the “R&R”).<sup>1</sup> In the R&R, the Court directed Highland to “submit a form of Judgment applicable to each Note Maker Defendant that calculates proper amounts due pursuant to th[e] Report and Recommendation, including interest accrued to date (and continuing per diem), as well as attorneys’ fees incurred.” R&R at 44-45.

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<sup>1</sup> Identical copies of the R&R were filed in Adv. Pro. No. 21-03003 at **Docket No. 191**; Adv. Pro. No. 21-03004 at **Docket No. 163**; Adv. Pro. No. 21-03005 at **Docket No. 207**; Adv. Pro. No. 21-03006 at **Docket No. 213**; and Adv. Pro. No. 21-03007 at **Docket No. 208**.

5. As set forth below, and in accordance with the Court's direction in the R&R, I and others working at my direction have reviewed invoices related to the attorneys' fees and expenses charged to Highland in the Notes Litigation and calculated the amount of attorneys' fees and expenses incurred in connection therewith.

**A. Attorneys' Fees Charged by Pachulski Stang Ziehl & Jones LLP**

6. In the ordinary course of business, timekeepers (including attorneys and legal assistants) at my Firm record billable time in increments of one-tenth of an hour. Timekeepers are also required to classify their work by task codes and/or matter numbers to differentiate between individual tasks conducted for the same client.

7. For the period December 1, 2020, until August 10, 2021, the Firm's timekeepers recorded their time entries relating to the Notes Litigation under matter number ".002" and task code "BL" (short for "Bankruptcy Litigation"). Attached as **Exhibit A** are the Firm's invoices for the period December 1, 2020, through August 10, 2021, that reflect all of the Firm's time billed to the Notes Litigation.

8. For the period August 11, 2021, through December 31, 2021, the Firm's timekeepers recorded their time entries relating to the Notes Litigation under matter number ".003" and task code "NL" (short for "Notes Litigation"). Attached as **Exhibit B** are the Firm's invoices for the period August 11, 2021, through December 31, 2021, that reflect all of the Firm's time billed to the Notes Litigation.

9. On January 1, 2022, the Firm created a new matter number (".004") for timekeepers to record their time entries relating to the Notes Litigation. Attached as **Exhibit C** are the Firm's invoices for the period January 1, 2022, through July 31, 2022, that reflect all of the Firm's time billed to the Notes Litigation.

10. We have reviewed the attached invoices and redacted all entries that we concluded were inadvertently coded or charged to the Notes Litigation (“Misapplied Time”). Based on that review, we believe the attached invoices capture and reflect fees properly charged by my Firm to Highland with respect to the Notes Litigation.

11. For the period December 1, 2020 through July 31, 2022, the attorneys’ fees billed by the Firm’s timekeepers with respect to the Notes Litigation and charged to Highland are in the total aggregate amount of \$2,663,585.30 (the “Fees”).

**B. Third-Party Expenses Incurred In Connection with the Notes Litigation**

12. In order to conserve resources, the Firm retained a third-party litigation support from a firm called “Robert Half” to review documents for responsiveness and privilege in connection with the Notes Litigation. Attached as **Exhibit D** are the invoices for services rendered by Robert Half in connection with the Notes Litigation for the period December 1, 2020 through July 31, 2022 (the “Robert Half Expenses”).

13. Finally, Highland took and defended numerous depositions in connection with the Notes Litigation. Attached as **Exhibit E** are invoices rendered by TSG Reporting, Inc. for court reporting services rendered in connection with the Notes Litigation for the period December 1, 2020 through July 31, 2022 (the “Court Reporting Expenses,” and together with the Robert Half Expenses, the “Expenses”).

14. For the period December 1, 2020 through July 31, 2022, the Expenses incurred by the Firm and charged to Highland with respect to the Notes Litigation are in the total aggregate amount of \$57,460.55.

**C. Summary of All Fees and Expenses Incurred by Highland in the Notes Litigation**

15. Attached as **Exhibit F** is chart showing that the aggregate amount of all Fees and Expenses charged to Highland in connection with the collection of the Notes is \$2,797,105.35.

16. As the Court is aware, there was substantial overlap in the legal and factual issues in the five adversary proceedings. Consequently, there was no reasonable way to allocate the Fees and Expenses separately between each Note Litigation and we believe the fairest method of allocating the Fees and Expenses under the circumstances is to charge each Defendant for one-fifth the total, or \$559,421.07.

17. I declare under penalty of perjury that the forgoing is true and correct.

Dated: August 5, 2022

/s/ John A. Morris

John A. Morris

## **EXHIBIT A**

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

December 31, 2020

Invoice 126769

Client 36027

Matter 00002

**JNP**

Board of Directors  
Highland Capital Management LP  
300 Crescent Court ste. 700  
Dallas, TX 75201

RE: Postpetition

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**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 12/31/2020**

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Highland Capital Management LP  
36027 - 00002

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December 31, 2020

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telephone conference with B. Levine re: collection  
actions on demand notes (0.1);









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01/10/2021	IDK	BL	E-mails with K Brown re overseeing demand note	0.20	1325.00	\$265.00
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January 31, 2021

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Highland Capital Management LP  
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January 31, 2021

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January 31, 2021

[illegible]

the 1990s, the number of people in the United States who are 65 years of age or older is projected to increase from 20 million to 35 million. The number of people aged 75 and older is projected to increase from 10 million to 17 million. The number of people aged 85 and older is projected to increase from 3 million to 5 million.

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Highland Capital Management LP  
36027 -00002

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Hours Rate Amount

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			[REDACTED]			
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			[REDACTED]			
			[REDACTED]			
01/13/2021	GVD	BL	Conference with K. Brown and H. Winograd re demand note issues	0.80	950.00	\$760.00
01/13/2021	HRW	BL	[REDACTED] Call with G. Demo and K. Brown re: demand note complaints (0.6); Call with G. Demo re: demand note complaints (0.1); [REDACTED]		695.00	
			Review Demand Notes and related documents (0.8)			
			Draft Demand Note Complaints against Dondero and related entities (4.5).			
			[REDACTED]			
			[REDACTED]			
01/14/2021	IDK	BL	E-mails with H Winograd and J Morris re next steps on complaints on demand notes (.1).	0.10	1325.00	\$132.50
			[REDACTED]			
01/14/2021	JNP	BL	Review email regarding suits against noteholders and next steps.	0.10	1295.00	\$129.50



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Highland Capital Management LP  
36027 -00002

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January 31, 2021

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/14/2021	KHB	BL			1225.00	
			call with Greg Demo (GD), J. Morris (JM) and Hayley Winograd ("HG") re litigation strategy on promissory notes (.4); confer with HG re form of complaints (.2); review and revise complaint (1.6); emails with HG re revisions to complaints (.5).			
01/14/2021	JAM	BL			1245.00	
			telephone conference with G. Demo re: complaints against makers of notes (0.2);			
			telephone conference with K. Brown, H. Winograd, G. Demo (partial participation) re: complaints against makers of notes			

[illegible]





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Highland Capital Management LP  
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January 31, 2021

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Highland Capital Management LP  
36027 -00002

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January 31, 2021

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/18/2021	KHB	BL	<div>review comments to complaints on promissory notes by J. Morris and email to J. Morris and H. Winograd re same (.2); work on complaints (.7); call with Committee counsel, J. Morris and J. Pomerantz re litigation strategy (.7).</div>	1225.00		
01/18/2021	JAM	BL	<div>review/revise draft Complaint against Dondero for recovery under demand notes (0.9); e-mail to K. Brown, H. Winograd, J. Pomerantz, I. Kharasch, G. Demo re: revisions to draft Complaint against Dondero for recovery under demand notes (0.2); e-mails to Sidley, J. Pomerantz, G. Demo, H. Winograd re: complaints for recovery under demand notes (0.3);</div>	1245.00		

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Highland Capital Management LP  
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Invoice 127125  
January 31, 2021

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			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
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[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]
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01/18/2021	HRW	BL
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Draft complaints against Dondero and related entities re: demand notes (7.5); Call with Committee re: litigation strategy (0.8).

8.30	695.00	\$5,768.50
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[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]

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Highland Capital Management LP  
36027 - 00002

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Highland Capital Management LP  
36027 -00002

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January 31, 2021

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	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
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[REDACTED]

review Z. Annable  
comments to note complaints and cover sheets (0.2);  
e-mail to Z. Annable re: note complaints and cover  
sheets (0.1); telephone conference with J. Seery re:  
note complaints (0.1);

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

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[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]



**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

February 28, 2021

Invoice 127314

Client 36027

Matter 00002

**JNP**

Board of Directors  
Highland Capital Management LP  
300 Crescent Court ste. 700  
Dallas, TX 75201

RE: Postpetition

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**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 02/28/2021**

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Pachulski Stang Ziehl & Jones LLP  
Highland Capital Management LP  
36027 - 00002

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Invoice 127314  
February 28, 2021

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1522 J. Zhang et al.

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**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

March 31, 2021

Invoice 127522

Client 36027

Matter 00002

**JNP**

Board of Directors  
Highland Capital Management LP  
300 Crescent Court ste. 700  
Dallas, TX 75201

RE: Postpetition

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**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 03/31/2021**

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Page: 12  
Invoice 127522  
March 31, 2021

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Highland Capital Management LP  
36027 - 00002

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Highland Capital Management LP  
36027 -00002

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Invoice 127522  
March 31, 2021

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			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
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[REDACTED]	[REDACTED]	[REDACTED]
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03/03/2021	HRW	BL
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Prepare joint proposed scheduling order for demand  
note adversary proceedings (0.8);

0.80	695.00	\$556.00
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[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]
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03/04/2021	JAM	BL
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[REDACTED] e-mails with H. Winograd re: model  
scheduling order for notes litigation (0.1); e-mail to.  
L. Hogewood, D. Rukavina re: proposed scheduling

	1245.00	
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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			orders for HCMFA and Nexpoint notes litigation (0.2).			
03/04/2021	HRW	BL	Prepare joint proposed scheduling order for demand note adversary proceedings (1.8);	1.80	695.00	\$1,251.00
						0
03/05/2021	JAM	BL			1245.00	
			e-mail to L. Drawhorn, H. Winograd re: proposed scheduling orders for HCRE and HCMS notes litigation (0.2); e-mail to D. Rukavina re: proposed scheduling orders for Nexpoint and HCMFA notes litigation (0.1).			
03/07/2021	JAM	BL	Review/revise proposed scheduling orders for HCMFA and NexPoint notes litigation (0.4); e-mail to D. Rukavina, L. Hogewood, H. Winograd re: revised proposed scheduling orders for HCMFA and NexPoint notes litigation (0.2);		1245.00	
03/07/2021	GVD	BL	Correspondence with J. Morris re term note defaults	0.20	950.00	\$190.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/08/2021	JNP	BL	Conference with John A. Morris regarding promissory note litigation issues.	0.10	1295.00	\$129.50
03/08/2021	JAM	BL	communications with J. Seery, J. Pomerantz, J. Bonds re: Dondero request for extension of time to respond to notes litigation (0.2);		1245.00	
03/08/2021	HRW	BL	Review and draft joint proposed scheduling orders for Demand Note adversary proceedings relating to HCRE, HCMFA, NPA, HCMS (1.5);		695.00	

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/09/2021	JAM	BL			1245.00	
			e-mails with H. Winograd, Z. Annable re: scheduling orders for the HCRE and HCMS adversary proceedings (0.2); e-mails with H. Winograd, Z. Annable re: scheduling orders for NexPoint and HCMFA adversary proceedings (0.1);			
03/09/2021	HRW	BL			695.00	
			Review joint proposed scheduling orders for Demand Note adversary proceedings relating to HCRE, HCMFA, NPA, HCMS (0.8).			

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
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03/10/2021	JAM	BL	[REDACTED] [REDACTED] communications with Z. Annable, D. Rukavina, H. Winograd re: scheduling matters for notes litigation (0.2); [REDACTED] [REDACTED]	[REDACTED]	1245.00	[REDACTED]
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				Hours	Rate	Amount
03/18/2021	JAM	BL	E-mail to J. Seery re: promissory notes' litigation (0.1); review/revise draft document request for Dondero (notes litigation) (0.2); e-mail to G. Demo, H. Winograd re: requests to admit for Dondero (notes litigation) (0.3);		1245.00	
03/18/2021	HRW	BL	Draft discovery demands directed to Dondero for demand note litigation (2.8);		695.00	

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/19/2021	JAM	BL			1245.00	
			review/revise discovery requests to Dondero re: notes litigation (0.3); e-mails to J. Seery, J. Pomernatz, I. Kharasch, G. Demo, H. Winograd re: discovery requests to Dondero re: notes litigation (0.2); review/revise and send e-mail to J. Seery, PSZJ team re: scheduling of notes litigation (0.2);			

03/24/2021 HRW BL



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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/25/2021	JAM	BL	E-mails to Bonds Ellis re: Debtor's discovery demands for Dondero notes litigation (0.3).	0.30	1245.00	\$373.50
03/26/2021	JNP	BL	Review Dondero motion for continuance of note lawsuit.	0.10	1295.00	\$129.50
03/26/2021	JNP	BL	Review emails regarding Dondero note litigation	0.10	1295.00	\$129.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/26/2021	JAM	BL	<p>Telephone conference with J. Seery re: Dondero request for extension of trial date in notes litigation (0.2); telephone conference with J. Pomerantz re: status of notes litigation, Dondero request for extension of schedule (0.1); e-mail to J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: Dondero request for extension of trial date in notes litigation (0.1); e-mail to B. Assink re: Dondero request for extension of trial date in notes litigation (0.1); review Dondero demand notes and e-mail to D. Klos, B. Sharp, J. Pomerantz, G. Demo, H. Winograd re: same (0.5); review documents concerning Dondero demand notes (0.8); e-mail to K. Hendricks, D. Klos, B. Sharp, J. Pomerantz, G. Demo, H. Winograd re: facts/documents concerning Dondero demand notes (0.3); review Dondero motion to extend trial date in Notes litigation and emergency motion for expedited hearing (0.4); e-mail to J. Seery, J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: Dondero motion to extend trial date in Notes litigation and emergency motion for expedited hearing (0.1); telephone conference with H. Winograd re: facts/objection to Dondero motion to extend trial date (0.2); telephone conference with J. Seery re: objection to Dondero motion to adjourn trial date (0.1).</p>	2.90	1245.00	\$3,610.50

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				Hours	Rate	Amount
03/26/2021	GVD	BL	Conference with J. Morris re demand note issues	0.20	950.00	\$190.00
03/26/2021	HRW	BL	Call with J. Morris re: objection to Dondero emergency motion for continuance of demand note proceeding (0.1); Review Dondero emergency motion for continuance of demand note proceeding (0.2); Draft request for admission directed to James Dondero in demand note proceeding (1.8).	2.10	695.00	\$1,459.50
03/27/2021	JAM	BL	Review documents and draft objection to Dondero motion for continuance in notes litigation (4.4); e-mails to H. Winograd, L. Canty re: draft objection to Dondero motion for continuance in notes litigation (0.3); e-mail to D. Klos, K. Hendricks, J. Pomerantz, G. Demo, H. Winograd, B. Sharp re: facts concerning Notes litigation against Dondero (0.2).	4.90	1245.00	\$6,100.50
03/27/2021	LSC	BL	Review documents and retrieve and prepare exhibits in connection with Dondero Motion for Continuance in Notes Actions.	4.40	460.00	\$2,024.00



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03/29/2021 JAM BL

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Hours Rate Amount

						
03/29/2021	LSC	BL	Prepare redacted exhibits for Objection to Dondero motion to modify scheduling order.	0.50	460.00	\$230.00
						
						
						
						
						
						
						
						
						
03/29/2021	HRW	BL	Edit and review objection to Dondero's emergency motion to continue demand note proceedings (2.5).	2.50	695.00	\$1,737.50
						
						
						
						
						



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e-mails with B. Assink, H. Winograd re: modified scheduling order in Dondero's notes litigation (0.1)..

**Pachulski Stang Ziehl & Jones LLP**

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13th Floor  
Los Angeles, CA 90067

April 30, 2021

Invoice 127680

Client 36027

Matter 00002

**JNP**

Board of Directors  
Highland Capital Management LP  
300 Crescent Court ste. 700  
Dallas, TX 75201

RE: Postpetition

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**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 04/30/2021**

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Dondero counsel correspondence re their intent to file motion to withdraw reference on collection actions and opposition (.2).			
04/01/2021	JNP	BL	Emails to and from Gregory V. Demo regarding D. Rukavina email regarding withdrawal of the reference.	0.10	1295.00	\$129.50
04/01/2021	JNP	BL	Review and respond to email regarding withdrawal of reference for note lawsuits.	0.10	1295.00	\$129.50
04/01/2021	JAM	BL	Telephone conference with H. Winograd re: discovery in AP against Advisors (notes litigation) (0.1); prepare discovery document requests and interrogatories for AP against Advisors (notes litigation) (0.9); review/revise requests for admission for AP against Advisors (notes litigation) (0.3); e-mails with H. Winograd re: discovery requests for AP against Advisors (notes litigation) (0.2); e-mail to D. Rukavina, H. Winograd re: discovery in AP against Advisors (notes litigation) (0.1).		1245.00	

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04/08/2021	HRW	BL	Review demand note adversary proceeding complaints (0.3).	0.30	695.00	\$208.50
			[REDACTED]			
04/09/2021	IDK	BL	E-mails with G Demo, others on Plan provisions re note collection/litigation issues	0.30	1325.00	\$397.50
			[REDACTED]			
			[REDACTED]			
04/09/2021	JMF	BL	Review notes receivable litigation and amounts due from noteholders re plan implementation (2.1)	2.10	1050.00	\$2,205.00
			[REDACTED]			
04/09/2021	JAM	BL	Review of rules re: withdrawal of the reference (0.4); telephone conference with Z. Annable re: rules		1245.00	

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			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
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					for withdrawal of the reference (0.1);
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04/09/2021	GVD	BL
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Review issues re notes litigation

0.60	950.00	\$570.00
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04/13/2021	JMF	BL	Review motion and brief for withdrawal of	0.50	1050.00	\$525.00
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04/13/2021 JAM BL



D. Rukavina, J. Pomerantz re: scheduling issues concerning adversary proceeding against Advisors and Funds (0.5); e-mail to Court, D. Rukavina, L. Hogewood, J. Pomerantz re: scheduling issues

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
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			concerning adversary proceeding against Advisors and Funds (0.3;)			
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04/14/2021	GVD	BL				
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			Correspondence re note and discovery request			
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0.10	950.00	\$95.00
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04/14/2021	HRW	BL				
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			Draft Rule 26 disclosures for Dondero demand note adversary proceeding (2.0).			
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2.00	695.00	\$1,390.00
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				Hours	Rate	Amount
04/15/2021	HRW	BL	Prepare Rule 26 disclosures for Dondero demand note adversary proceeding (0.6).	0.60	695.00	\$417.00
04/16/2021	IDK	BL	E-mail and telephone conference with J Pomerantz re Dondero withdrawal of reference motions and logistics on response to same and J Kim (.2); E-mail and telephone conference with G Demo re same and relevant pleadings (.2); E-mails with J Kim re need for responses to Dondero withdrawal of reference motions (.2).	0.60	1325.00	\$795.00
04/16/2021	JJK	BL	Research re: reference withdrawal, core matter, Stern, related issues.	3.70	995.00	\$3,681.50



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			adversary proceeding pending motion to withdraw reference (0.3).			
04/17/2021	JAM	BL	Review Dondero motion to expedite stay motion (0.3); e-mail to J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: analysis of Dondero motion to expedite stay motion (0.4); draft objection to Dondero motion to expedite motion for stay (2.7).	3.40	1245.00	\$4,233.00
04/17/2021	HRW	BL	Draft demand note discovery requests (2.5).	2.50	695.00	\$1,737.50
04/18/2021	JNP	BL	Review and comment on opposition to motion for stay of discovery and emails regarding same.	0.20	1295.00	\$259.00
04/18/2021	JAM	BL	Review and revise initial draft objection to Dondero's motion to expedite motion for stay (2.9); e-mail to J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: initial draft objection to Dondero's motion to expedite motion for stay (0.1); draft JAM declaration in support of objection to Dondero's motion to expedite motion for stay (0.5); e-mail to Z. Annable, G. Demo, H. Winograd re: declaration and objection concerning Dondero's motion to expedite (0.1).	3.60	1245.00	\$4,482.00
04/18/2021	GVD	BL	Review objection to motion to expedite	0.30	950.00	\$285.00



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04/19/2021 JAM BL

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04/21/2021	JJK	BL	Research and prepare objection to NexPoint reference withdrawal motion.	2.10	995.00	\$2,089.50
04/21/2021	JJK	BL	Research and prepare objection to NexPoint/HCMFA reference motions.	5.40	995.00	\$5,373.00
04/21/2021	JJK	BL	Research/draft objection to HCMFA reference withdrawal motion.	3.00	995.00	\$2,985.00
04/21/2021	JNP	BL	Research regarding withdrawal reference and conference with Ira D. Kharasch and review of complaint and emails with Jeffrey H. Davidson regarding same.	0.40	1295.00	\$518.00
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04/25/2021	JAM	BL	E-mails to L. Drawhorn, J. Seery, J. Pomerantz re: HCRE's proposed amended of notes complaint (0.1).	0.10	1245.00	\$124.50
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
04/26/2021	IDK	BL	E-mails with J Pomerantz re status on oppositions to motions to withdraw reference, [REDACTED]	0.20	1325.00	\$265.00
			[REDACTED]			
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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/26/2021	HRW	BL	Call with G. Demo, J. Morris, B. Sharp, and meta e-discovery reps regarding responding to various discovery requests in adversary proceedings.	0.20	695.00	\$139.00
04/26/2021	HRW	BL	Review discovery demands in Notes Litigation.	1.00	695.00	\$695.00
04/26/2021	HRW	BL	Research summary judgement standard for notes litigation.	2.20	695.00	\$1,529.00



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				Hours	Rate	Amount
04/28/2021	GVD	BL	Review response to motion to withdrawal the reference	0.50	950.00	\$475.00
04/28/2021	HRW	BL	Review Dondero's responses to discovery requests in notes litigation.	0.10	695.00	\$69.50
04/28/2021	HRW	BL	Draft Responses and Objections for NPA discovery demands in notes litigation.	0.30	695.00	\$208.50







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				Hours	Rate	Amount
		BL				
04/29/2021	HRW	BL	Call with G. Demo regarding NPA discovery requests in notes litigation.	0.40	695.00	\$278.00
04/29/2021	HRW	BL	Call with G. Demo, K. Hendrix, D. Klos, J. Donahue regarding NPA discovery requests in notes litigation.	0.30	695.00	\$208.50
04/29/2021	HRW	BL	Draft responses & objections to NPA's discovery requests in notes litigation.	8.00	695.00	\$5,560.00
04/29/2021	HRW	BL	Call with J. Morris regarding NPA discovery in notes litigation.	0.60	695.00	\$417.00
04/30/2021	IDK	BL	E-mails with J Kim re opposition to Advisors' and others motions to withdraw the reference (.6); Review of revised oppositions to same (.2).	0.80	1325.00	\$1,060.00
04/30/2021	JJK	BL	Additional research for objections to withdrawal reference motions of NexPoint, HCMFA, Dondero, and revise same objections.	3.60	995.00	\$3,582.00
04/30/2021	JJK	BL	Revise objections to reference withdrawal motions and emails Kharasch on same.	2.10	995.00	\$2,089.50
04/30/2021	JMF	BL	Review motion to stay adversary proceedings.	0.40	1050.00	\$420.00

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				Hours	Rate	Amount
04/30/2021	HRW	BL	Draft responses and objections to NPA's discovery requests in notes litigation.	3.50	695.00	\$2,432.50
04/30/2021	HRW	BL	Call with J. Morris regarding NPA discovery requests in notes litigation.	0.10	695.00	\$69.50
04/30/2021	HRW	BL	Call with D. Klos regarding NPA discovery requests in notes litigation.	0.60	695.00	\$417.00

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

Board of Directors  
Highland Capital Management LP  
300 Crescent Court ste. 700  
Dallas, TX 75201

May 31, 2021  
Invoice 127958  
Client 36027  
Matter 00002  
**JNP**

RE: Postpetition

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**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 05/31/2021**

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			NextPoint motion to withdraw the reference, as well as feedback of others re same and consider (.5) Attend conference call with J Pomerantz, J Kim, G Demo re open issues on draft opposition to motions to withdraw reference (.3); Review of further revised draft of opposition to same (.2); Attend next conference call re same on next draft of opposition (.4).			
05/03/2021	JJK	BL	Emails Pomerantz, Demo re: opp to NexPoint/HCMFA withdrawal reference motions; research/analysis/revisions to same.	2.40	995.00	\$2,388.00
05/03/2021	JJK	BL	Prepare opp to HCMFA withdrawal reference motion and analysis for same.	2.70	995.00	\$2,686.50
05/03/2021	JJK	BL	Analysis/revise oppositions to NexPoint and HCMFA reference motions.	3.70	995.00	\$3,681.50
05/03/2021	JJK	BL	Research/analysis re: reference withdrawal matters.	1.00	995.00	\$995.00
05/03/2021	JNP	BL	Brief review of motion to enforce reference.	1.00	1295.00	\$1,295.00
05/03/2021	JNP	BL	Conference with Robert J. Feinstein regarding motion to enforce reference and related litigation matters.	0.30	1295.00	\$388.50
05/03/2021	JNP	BL	Conference with Robert J. Feinstein and Gregory V. Demo regarding motion to enforce reference.	0.20	1295.00	\$259.00
05/03/2021	JNP	BL	Review revised motion to withdraw reference response.	0.30	1295.00	\$388.50
05/03/2021	JNP	BL	Conference with Jonathan J. Kim, Ira D. Kharasch and Gregory V. Demo regarding motion to withdraw	0.60	1295.00	\$777.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			reference responses (2x).			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
			[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/03/2021	GVD	BL	Revise and serve demand letter re Dugaboy note	0.30	950.00	\$285.00
05/03/2021	GVD	BL	Revise and serve demand letter re Hunter Mountain note	0.30	950.00	\$285.00
05/03/2021	GVD	BL	Conference with PSZJ team re response to withdrawal of reference in NPA notes litigation	0.40	950.00	\$380.00
05/03/2021	GVD	BL	Review and revise response to motion to enforce the reference in NPA notes litigation	1.20	950.00	\$1,140.00
05/03/2021	GVD	BL	Follow up conference with PSZJ re opposition to motion to withdraw the reference in NPA litigation	0.30	950.00	\$285.00
05/03/2021	GVD	BL	Conference with J. Morris re status of notes litigation	0.20	950.00	\$190.00
05/04/2021	IDK	BL	Review of J Kim's next version of opposition to NextPoint motion to withdraw reference (.3); E-mails with J Kim re my proposed changes to same, as well as comments/questions from J Pomerantz re same and J Kim response (.5); Review of final revised opposition to same and green light to file (.2).	1.00	1325.00	\$1,325.00
05/04/2021	JKK	BL	Emails Demo, Morris, Pomerantz on withdrawal reference pleadings issues; research/revise oppositions to reference withdrawal motions.	2.20	995.00	\$2,189.00





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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/05/2021	HRW	BL	Prepare interrogatory verification for R&Os to NPA interrogatories in notes litigation (0.2); Review Seery's comments to R&Os to NPA discovery demands in notes litigation (0.1); Review DSI documents for production for NPA discovery demands in notes litigation (0.2).	0.50	695.00	\$347.50
05/06/2021	IDK	BL	Review of updated opposition to Dondero motion to withdraw reference (.3); E-mails with J Kim re same and further issues on mandatory withdrawal of reference and related memo on same (.3); Telephone conference with J Pomerantz re same (.1); E-mails with J Kim re status and ok to file (.1).	0.80	1325.00	\$1,060.00
05/06/2021	IDK	BL	E-mails with J Kim re mistake made in filed opposition today to Dondero motion to withdraw ref, and how to fix, including feedback of J Pomerantz re same.	0.40	1325.00	\$530.00
05/06/2021	JJK	BL	Emails Kharasch on withdrawal reference objections, and revise same and prepare supplement for filing.	4.20	995.00	\$4,179.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/06/2021	HRW	BL	Communicate with R. Half re: NPA production in demand note proceeding (0.9); Call with L. Canty re: NPA production in notes litigation (0.1); Review critical dates re: Dondero stay motion and motion to withdraw reference in notes litigation (0.2); Prepare search terms for NPA production in notes litigation (0.3).	1.50	695.00	\$1,042.50
05/07/2021	IDK	BL	Review of draft addendum to prior filed opposition to Dondero motion to withdraw ref and consider changes (.2); E-mails with J Kim and J Pomerantz re same, as well as feedback of local counsel (.3).	0.50	1325.00	\$662.50
05/07/2021	JJK	BL	Two conf. calls (2x 0.3) with Pomerantz, Kharasch, Demo on reference withdrawal oppositions.	0.60	995.00	\$597.00







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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/07/2021	HRW	BL	Review discovery requests in notes litigation (2.0); Edit R&O's for NPA discovery requests (0.3).	2.30	695.00	\$1,598.50
05/08/2021	RJF	BL	Review and revise motion to enforce.	0.80	1395.00	\$1,116.00
05/08/2021	JAM	BL	Review/revise document requests, interrogatories, and requests for admission relating to HCMS notes litigation (1.1); e-mails with J. Pomerantz, H. Winograd re: revisions to discovery requests for HCMS notes litigation (0.2).	1.30	1245.00	\$1,618.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/08/2021	HRW	BL	Draft discovery demands for notes litigation (3.5); Review discovery requests to Debtor in notes litigation (1.2).	4.70	695.00	\$3,266.50
05/09/2021	HRW	BL	Review discovery requests to Debtor in notes litigation (2.5); Prepare search terms for document production in notes litigation (1.0).	3.50	695.00	\$2,432.50
05/10/2021	RJF	BL	Begin work on motion to dismiss.	1.00	1395.00	\$1,395.00















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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			[REDACTED]			
05/17/2021	JAM	BL	Review/revise objection to Dondero motion to compel (2.0); e-mails with J. Pomerantz, G. Demo, H. Winograd, Z. Annable re: draft objection to Dondero motion to compel (0.2); draft JAM declaration in support of Debtor's objection to Dondero motion to compel (0.7); e-mails with G. Demo, H. Winograd, L. Canty, Z. Annable re: exhibits to JAM declaration (0.2).	3.10	1245.00	\$3,859.50
			[REDACTED]			
			[REDACTED]			
05/17/2021	LSC	BL	Conduct research in connection with motion to withdraw the reference for G. Demo.	0.60	460.00	\$276.00
05/17/2021	LSC	BL	Assist with preparation of exhibits in connection with Debtor's Objection to Motion to Compel Deposition Testimony of James P. Seery, Jr.	0.40	460.00	\$184.00
			[REDACTED]			
			[REDACTED]			
05/17/2021	GVD	BL	Review response to motion to compel	0.30	950.00	\$285.00
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05/17/2021	GVD	BL	Prepare for argument on motions to withdraw the reference	0.80	950.00	\$760.00
			[REDACTED]			
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			( [REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
05/17/2021	HRW	BL	Oversee discovery searches and production for NPA notes litigation (0.3); Review opposition to Dondero motion to compel in notes litigation (0.2).	0.50	695.00	\$347.50
05/ [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
05/18/2021	JNP	BL	Review motion to withdraw the reference in	0.40	1295.00	\$518.00





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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/18/2021	GVD	BL	Prepare for argument re motion to withdraw the reference	4.90	950.00	\$4,655.00
05/18/2021	HRW	BL	Gather general discovery in notes litigations (0.5); Review discovery demands in notes litigation (0.3); Call with J. Morris re: general discovery for notes litigation (0.1); Call with J. Donahue re: general discovery for notes litigation (0.3).	1.20	695.00	\$834.00
05/19/2021	IDK	BL	Attend conference call with J Pomerantz, others on	1.20	1325.00	\$1,590.00







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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/19/2021	GVD	BL	Attend conference with PSZJ working team re preparation for argument on motion to withdraw reference	1.20	950.00	\$1,140.00
05/19/2021	GVD	BL	Prepare for argument on motion to withdraw the reference	3.10	950.00	\$2,945.00
05/19/2021	HRW	BL	Send amended discovery R&Os to opposing counsel for NPA requests in notes litigation (0.1); Call with J. Morris and C. Mackle re: document production to Dondero's first Set of requests in notes litigation (0.3); Send production to Dondero's counsel in response to first set of requests in notes litigation (0.1).	0.50	695.00	\$347.50
05/19/2021	HRW	BL	Prepare and review document production to Dondero's first Set of requests in notes litigation (2.2).	2.20	695.00	\$1,529.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/20/2021	JNP	BL	Participate in hearing on motion to compel J. Seery testimony.	1.10	1295.00	\$1,424.50
05/20/2021	JNP	BL	Emails to and from J. Seery and Gregory V. Demo regarding Latham communications with DSL.	0.10	1295.00	\$129.50
05/20/2021	JNP	BL	Emails to and from John A. Morris regarding U. S. Trustee inquiry.	0.10	1295.00	\$129.50
05/20/2021	JAM	BL	Preparing for hearing on Dondero's motion to compel (0.3); court conference on Dondero's motion to compel (1.1).	1.40	1245.00	\$1,743.00
05/20/2021	GVD	BL	Attend hearing re motion to compel	1.10	950.00	\$1,045.00



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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/20/2021	JE	BL	Work on reply brief (11.0); review motion to amend complaint (.4); call with Mr. Morris regarding briefing (.3); research judgment issues (1.4).	13.10	1195.00	\$15,654.50
05/21/2021	JMF	BL	Review replies re contempt and reference withdrawal motions.	0.40	1050.00	\$420.00
05/21/2021	JAM	BL	Finalize responses and objections to Dondero's second set of document requests (0.1); e-mail to Dondero's counsel re: R&Os to second set of document requests (0.1).	0.20	1245.00	\$249.00
05/21/2021	GVD	BL	Prepare witness and exhibit list re notes litigation	0.60	950.00	\$570.00



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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/22/2021	JNP	BL	Review motion to compel testimony of former employees.	0.20	1295.00	\$259.00
05/22/2021	GVD	BL	Conference with J. Morris, J. Seery, and HCMLP team re HCMFA affirmative defense	1.10	950.00	\$1,045.00
05/22/2021	GVD	BL	Review motions for leave to amend	0.20	950.00	\$190.00
05/22/2021	HRW	BL	Review HCMFA motion to amend answer (0.5).	0.50	695.00	\$347.50
05/23/2021	JNP	BL	Emails to and from D. Rukavina regarding Sauter subpoena in connection with reference motion.	0.20	1295.00	\$259.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/23/2021	JAM	BL	Prepare Subpoena for DC Sauter (notes litigation) for hearing on motion to withdraw reference (0.3); e-mail to J. Seery, T. Surgent, D. Klos, J. Pomerantz, G. Demo, H. Winograd re: strategy, hearing on motion to withdraw reference (0.3); telephone conference with J. Seery, G. Demo re: prepare for deposition (Dondero notes litigation) (1.1); e-mail to H. Winograd, J. Pomerantz, I. Kharasch, G. Demo re: motion for summary judgment, opposition to motions to amend (0.7); communications with G. Demo re: potential exhibits for amended W&E list (0.2); e-mails with B. Levine re: Dondero summary judgment motion (0.1); telephone conference with H. Winograd re: Dondero summary judgment motion (0.1); telephone conference with G. Demo re: documents/exhibit list/facts re: motion to withdraw the reference (1.1); revise Sauter subpoena (0.1); e-mails with Z. Annable re: Sauter subpoena (0.3); amend Sauter subpoena (0.1); e-mails with D. Rukavina, J. Pomerantz re: Sauter subpoena (0.3).	4.70	1245.00	\$5,851.50
05/23/2021	LSC	BL	Preparation of amended exhibit lists (3) and exhibits for 5/25/21 hearing, including redactions to certain exhibits.	5.60	460.00	\$2,576.00
05/23/2021	GVD	BL	Conference with J. Morris re motion to withdraw reference	0.10	950.00	\$95.00
05/23/2021	GVD	BL	Conference with J. Seery and J. Morris re depo prep for notes litigation	1.20	950.00	\$1,140.00
05/23/2021	GVD	BL	Conference with J. Morris re evidentiary issues for motion to withdraw the reference	1.10	950.00	\$1,045.00
05/23/2021	GVD	BL	Prepare for hearing on motion to withdraw the reference	2.90	950.00	\$2,755.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/24/2021	IDK	BL	Attend conference call re notes collection issues (.3).	0.30	1325.00	\$397.50
05/24/2021	JNP	BL	Review and comment on Gregory V. Demo outline on motion to withdraw reference argument.	0.50	1295.00	\$647.50
05/24/2021	JNP	BL	Conference with Gregory V. Demo, Ira D. Kharasch and John A. Morris regarding hearing on motion to withdraw reference.	0.60	1295.00	\$777.00
05/24/2021	JNP	BL	Conference with PSZJ team regarding update on notes litigation.	0.30	1295.00	\$388.50
05/24/2021	JNP	BL	Conference with John A. Morris regarding proposal regarding depositions in notes litigation.	0.10	1295.00	\$129.50



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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/24/2021	RJF	BL	Internal call regarding notes litigation.	0.30	1395.00	\$418.50
05/24/2021	JMF	BL	Review litigation summary (.3); status call re same (.3).	0.60	1050.00	\$630.00
05/24/2021	JMF	BL	Status call re issues in notes payable litigation.	0.30	1050.00	\$315.00
05/24/2021	JMF	BL	Review motion to amend answer re notes litigation.	0.30	1050.00	\$315.00
05/24/2021	JAM	BL	Tel c. w/ J. Dubel re: motions to amend and withdraw the reference (0.4); prepare for Seery deposition (0.3); tel c. w/ G. Demo re: hearing on motion to withdraw the reference (0.2); tel c. w/ J. Seery re: deposition (0.1); review/revise exhibit list for hearing on motion to withdraw the reference (0.2); prepare for hearing on withdrawal of the reference (0.7); communications w/ J. Pomerantz, G. Demo re: debtor's schedules and Advisor's notes (0.2); Seery deposition (Dondero notes litigation) (2.7); tel c. w/ J. Seery, G. Demo re: deposition and hearing (0.4); tel c. w/ J. Pomerantz, I. Kharasch, G. Demo re: hearing on motion to withdraw the	7.00	1245.00	\$8,715.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			reference (0.6); tel c. w/ J. Pomerantz re: hearing (0.2); tel c. w/ J. Pomerantz re: e-mails with D. Rukavina concerning motion to amend/motion to withdraw reference (0.1); e-mails w/ D. Rukavina, J. Pomerantz re: motion to amend/Sauter subpoena/motion to withdraw the reference (0.4); e-mail to J. Seery re: deposition transcript (0.1); e-mail to J. Seery, J. Pomerantz, G. Demo, H. Winograd re: Klos deposition (0.1); e-mails w/ M. Aigen, J. Seery, T. Surgent, D. Klos re: discovery in Dondero notes litigation (0.3)			
05/24/2021	GVD	BL	Prepare for hearing on motion to withdraw the reference	5.80	950.00	\$5,510.00
05/24/2021	GVD	BL	Attend deposition of J. Seery re Dondero note litigation	2.60	950.00	\$2,470.00
05/24/2021	GVD	BL	Conference with J. Seery and J. Morris re follow up to Seery deposition	0.30	950.00	\$285.00
05/24/2021	GVD	BL	Conference with PSZJ re status of note litigation and motion to withdraw the reference	0.60	950.00	\$570.00
05/24/2021	GVD	BL	Attend PSZJ status conference on notes litigation	0.30	950.00	\$285.00



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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/25/2021	JNP	BL	Participate on hearing regarding motions to withdraw reference.	2.80	1295.00	\$3,626.00
05/25/2021	JNP	BL	Conference with J. Seery and John A. Morris after hearing on motion to withdraw reference.	0.40	1295.00	\$518.00
05/25/2021	JNP	BL	Emails regarding answer date and response.	0.10	1295.00	\$129.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/25/2021	JAM	BL	Prepare Notice of Service of Subpoena (NexBank) (0.2); e-mail to Z. Annable, G. Demo, H. Winograd re: Notice of Service of Subpoena (NexBank) (0.1); prepare Notice of Service of Subpoena (Advisors) (0.1); e-mail to Z. Annable, G. Demo, H. Winograd re: Notice of Service of Subpoena (Advisors) (0.1); meet and confer call w/ L. Phillips, M. Sbaiti re: document requests (0.5)	1.00	1245.00	\$1,245.00
05/25/2021	JAM	BL	Tel c. w/ G. Demo re: withdrawal of the reference hearing (0.1); prepare for withdrawal of the reference hearing (0.4); work on summary judgment against Dondero (notes litigation) (0.7); hearing on withdrawal of the reference (2.2); tel c. w/ J. Pomerantz re: hearing (0.1); tel c. w/ J. Seery, J. Dubel, J. Pomerantz, G. Demo re: hearing (0.4); telc . w/ G. Demo re: hearing, document production and related matters (0.3); e-mails w/ D. Klos, G. Demo re: document production (0.2); e-mails to L Canty re: document production (Dondero notes litigation) (0.3); e-mails to Dondero's counsel re: document production (0.1)	4.80	1245.00	\$5,976.00
05/25/2021	LSC	BL	Prepare for and assist at hearing on motions to stay and status conference re motion to withdraw the reference.	2.30	460.00	\$1,058.00





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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/26/2021	JAM	BL	Tel c. w/ D. Rukavina re: discovery concerning Advisors (notes litigation) (0.1); e-mails w/ D. Rukavina re: discovery concerning Advisors (notes litigation) (0.1); prepare for Dondero deposition (notes litigation) (3.0); e-mail to L. Canty re: exhibits for use in Dondero deposition (0.7); prepare written responses to Advisor's discovery requests (notes litigation) (2.4); review/revise written responses to Dondero's Third Set of Discovery Demands (0.7); e-mail to T. Surgent, D. Klos, G. Demo, H. Winograd re: written responses to Advisor's discovery requests (notes litigation) (0.2)	7.20	1245.00	\$8,964.00
05/26/2021	LSC	BL	Preparation of exhibits and materials in connection with J. Dondero's 5/28/21 deposition (Notes Litigation).	3.20	460.00	\$1,472.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/26/2021	HRW	BL	Review production for NPA discovery requests in notes litigation (0.3)	0.30	695.00	\$208.50
05/27/2021	JNP	BL	Conference with John A. Morris regarding Dondero amended answer and discovery issues.	0.20	1295.00	\$259.00





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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/28/2021	JNP	BL	Conference with John A. Morris regarding Dondero deposition on note litigation.	0.10	1295.00	\$129.50
05/28/2021	JAM	BL	Prepare for Dondero deposition (3.5); Dondero deposition (4.6); tel c. w/ J. Pomerantz re: Dondero deposition (0.1); tel c. w/ J. Seery re: Dondero deposition (0.3); e-mails w/ J. Seery, H. Winograd re: written responses to Advisor's discovery requests (0.2); e-mail to Bonds Ellis, J. Pomerantz, G. Demo, H. Winograd re: proposed order on stay (0.1)	8.80	1245.00	\$10,956.00
05/28/2021	LSC	BL	Preparation for and assist at deposition of Jim Dondero (notes litigation)	5.50	460.00	\$2,530.00
05/28/2021	GVD	BL	Conference with J. Morris and J. Seery re Dondero deposition and next steps	0.20	950.00	\$190.00
05/28/2021	GVD	BL	Attend Dondero Deposition (partial)	1.60	950.00	\$1,520.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/28/2021	HRW	BL	Prepare responses and objections to HCMFA discovery in notes litigation (0.4)	0.40	695.00	\$278.00
05/28/2021	HRW	BL	Deposition of Dondero in connection with notes litigation (3.5)	3.50	695.00	\$2,432.50
05/28/2021	HRW	BL	Review production for NPA discovery requests in notes litigation (0.3)	0.30	695.00	\$208.50
05/29/2021	JAM	BL	E-mails to Counsel re: Zoom instructions for Tuesday's depositions (0.2); review Dondero written responses to discovery (0.2); e-mail to B. Assink, C. Taylor, J. Pomerantz, G. Demo, H. Winograd re: Dondero's written responses to discovery (0.2)	0.60	1245.00	\$747.00
05/29/2021	JAM	BL	Review HCMFA's second request for discovery (0.2); e-mails w/ T. Surgent, D. Klos, G. Demo, H. Winograd re: HCMFA's second request for discovery (0.1); review Dondero expert report (0.3); e-mails w/ J. Pomerantz, G. Demo, H. Winograd re: Dondero's expert report (0.2); draft written responses to HCRE's document requests, interrogatories, and requests for admission (3.1); e-mail to G. Demo, H. Winograd re: draft written responses to HCRE's document requests, interrogatories, and requests for admission (0.1); tel c. w/ H. Winograd re: opposition to HCRE/Services motion for leave to serve amended complaint and cross-motion for summary judgment (0.4)	4.40	1245.00	\$5,478.00



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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			[REDACTED]			
05/29/2021	HRW	BL	Draft opposition to HCRE and HCMS motions for leave to amend answer in notes litigation (2.0)	2.00	695.00	\$1,390.00
05/29/2021	HRW	BL	Call with J. Morris re: opposition to HCRE and HCMS motions for leave to amend answer in notes litigation (0.3)	0.30	695.00	\$208.50
			[REDACTED]			
05/30/2021	JAM	BL	Review documents (1.9); tel c. w/ G. Demo re: document review/facts (1.1); e-mails w/ G. Demo re: facts (0.3); tel c. w/ G. Demo re: document review/facts (0.6); prepare for depositions (0.8)	4.70	1245.00	\$5,851.50
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
05/30/2021	GVD	BL	Conference with J. Morris re deposition preparation	0.60	950.00	\$570.00
			[REDACTED]			
05/30/2021	HRW	BL	Draft opposition to HCRE and HCMS motions for leave to amend answer in notes litigation (3.5)	3.50	695.00	\$2,432.50
			[REDACTED]			
05/31/2021	JAM	BL	Analyze G. Scott prior deposition transcript (2.4); analysis of use of Scott transcript, and e-mail to J. Pomerantz, G. Demo, H. Winograd concerning the same (0.6); prepare for Dondero and Scott depositions (6.4); e-mails w/ L. Canty re: deposition exhibits (0.2); tel c. w/ G. Demo, C. Wilkins re: potential conflicts (0.2); [REDACTED]		1245.00	
05/31/2021	JAM	BL	Review/revise discovery requests for HCRE (notes litigation (0.4); e-mail to L. Drawhorn, G. Demo, H. Winograd, J. Rudd re: discovery requests for HCRE (notes litigation) (0.1); tel c. w/ H. Winograd re: status of brief for opposition to motion to amend (0.2)	0.70	1245.00	\$871.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Demo, H. Winograd re: comments to draft objection to HCMS motion for leave to amend answer (0.1); tel c. w/ J. Dubel re: expert report (0.1); tel c. w/ H. Winograd re: objections to HCRE and HCMS motions for leave to amend answer (0.1); review/revise objections to HCRE and HCMS motions for leave to amend answer (0.2); e-mails w/ G. Demo, H. Winograd, D. Klos, K. Hendrix, J. Donohue re: partial payment/performance by HCRE and HCMS (0.1); communications w/ H. Winograd, Z. Annable re: finalizing and filing objections to HCRE and HCMS motions for leave to amend answer (0.2)			
06/01/2021	LSC	BL	Draft declarations in support of oppositions to HCMS and HCRE motions to amend (1.1); assist with revising and finalizing of oppositions to HCMS and HCRE motions to amend (1.3); revise and finalize exhibits (.5).	2.90	460.00	\$1,334.00
06/01/2021	GVD	BL	Review and revise motion for leave to amend HCRE and HCMS answers	2.00	950.00	\$1,900.00
06/01/2021	HRW	BL	Draft opposition to HCRE and HCMS motions for leave to amend answer in notes litigation (12.5)	12.50	695.00	\$8,687.50
06/02/2021	JMF	BL	Review responses to motions for leave to amend answer.	0.40	1050.00	\$420.00

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			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
06/02/2021	HRW	BL	Review documents produced in Dondero notes litigation (0.1)	0.10	695.00	\$69.50
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
06/03/2021	JAM	BL	E-mail to L. Drawhorn, J. Rudd, J. Pomerantz, G. Demo re: motion to withdraw the reference and related matters (0.3); e-mails w/ M. Aigen. Dondero's other counsel, J. Pomerantz, G. Demo, H. Winograd re: scheduling of expert depositions (0.1); prepare notices of deposition for Nancy Dondero and Dondero's expert witnesses and send to Z. Annable, H. Winograd (0.2); review HCRE/HCMS motions (0.3)	0.90	1245.00	\$1,120.50
06/03/2021	LSC	BL	Review documents, redact, and prepare NexPoint document production (and address numerous issues with).	8.20	460.00	\$3,772.00
			[REDACTED]			
			[REDACTED]			
06/03/2021	GVD	BL	Correspondence with J. Donohue re demand letters on notes	0.20	950.00	\$190.00
06/03/2021	GVD	BL	Correspondence with J. Morris re HCRE/HCMS motions for leave to amend	0.20	950.00	\$190.00

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				Hours	Rate	Amount
06/08/2021	HRW	BL	Communications with DSI re: HCMS discovery (0.3)	0.30	695.00	\$208.50
06/08/2021	HRW	BL	Draft R&Os to HCMS discovery (1.5)	1.50	695.00	\$1,042.50
06/08/2021	HRW	BL	Draft search terms for HCMS document production (1.0)	1.00	695.00	\$695.00
06/09/2021	JNP	BL	Review of motion to amend answer.	0.10	1295.00	\$129.50
06/09/2021	JNP	BL	Review motion to modify answer and emails regarding same.	0.20	1295.00	\$259.00
06/09/2021	JMF	BL	Review motion for leave to amend answer.	0.30	1050.00	\$315.00

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06/09/2021	JAM	BL	Review/revise R&Os to HCMS's discovery requests (0.7); e-mails with H. Winograd re: R&Os to HCMS's discovery requests (0.1).	0.80	1245.00	\$996.00
06/09/2021	LSC	BL	Preparation of document production to HCMS, including redaction of certain documents, and correspondence with H. Winograd regarding the same.	5.70	460.00	\$2,622.00
06/09/2021	HRW	BL	Draft R&Os for HCMS discovery demands (4.3)	4.30	695.00	\$2,988.50
06/09/2021	HRW	BL	Communicate with L. Canty re: HCMS document production (0.7)	0.70	695.00	\$486.50
06/09/2021	HRW	BL	Organize and review document production for HCMS (1.3)	1.30	695.00	\$903.50
06/09/2021	HRW	BL	Send HCMS productions in response to document requests (0.2)	0.20	695.00	\$139.00
06/09/2021	HRW	BL	Communicate with client re: R&Os to HCMS discovery and verification (0.2)	0.20	695.00	\$139.00
06/10/2021	IDK	BL	Office conference with J Morris re upcoming hearing this morning on notes litigation and presentation.	0.30	1325.00	\$397.50



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			conference with H. Winograd re: subpoena for PwC (0.1); telephone conference with D. Klos re: subpoena for PwC (0.1).			
06/10/2021	LSC	BL	Research in connection with subpoena and correspondence with H. Winograd regarding the same.	0.90	460.00	\$414.00
06/10/2021	LSC	BL	Prepare for and assist at hearing on motion to amend.	3.00	460.00	\$1,380.00
06/10/2021	GVD	BL	Attend hearing on motion to amend notes	2.50	950.00	\$2,375.00
06/10/2021	HRW	BL	Call with J. Morris re: PwC subpoenas (0.1)	0.10	695.00	\$69.50
06/10/2021	HRW	BL	Call with G. Demo re: HCMFA motion to amend (0.1)	0.10	695.00	\$69.50
06/10/2021	HRW	BL	Review HCMFA motion to amend (1.2)	1.20	695.00	\$834.00
06/10/2021	HRW	BL	Draft opposition to HCMFA motion to amend (0.6)	0.60	695.00	\$417.00
06/10/2021	HRW	BL	Draft document and deposition subpoenas for PwC (2.6)	2.60	695.00	\$1,807.00
06/10/2021	HRW	BL	Call with L. Canty re: PwC subpoenas (0.1)	0.10	695.00	\$69.50
06/10/2021	HRW	BL	Hearing on HCRE/HCMS motion to amend answer (1.0)	1.00	695.00	\$695.00

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06/11/2021	JNP	BL	Review emails regarding consolidation of notes litigation.	0.10	1295.00	\$129.50
06/11/2021	JNP	BL	Review of response to motion to quash.	0.10	1295.00	\$129.50
06/11/2021	JNP	BL	Conference with J. Seery, Robert J. Feinstein and Gregory V. Demo regarding status of Sentinel matters and next steps.	0.50	1295.00	\$647.50
06/11/2021	GVD	BL	Conference with J. Morris and H. Winograd re status of HCMFA amended answer	0.50	950.00	\$475.00
06/11/2021	GVD	BL	Correspondence with D. Rukavina re amendments to notes litigation	0.20	950.00	\$190.00
06/11/2021	HRW	BL	Draft subpoenas and ancillary documents for PwC in connection with HCMS notes litigation (1.6)	1.60	695.00	\$1,112.00
06/11/2021	HRW	BL	Send PwC subpoena to representative of PwC for HCMS notes litigation (0.2)	0.20	695.00	\$139.00
06/11/2021	HRW	BL	Communicate with local counsel and J. Morris re: subpoenas for PwC for HCMS notes litigation (0.6)	0.60	695.00	\$417.00
06/11/2021	HRW	BL	Meeting with client for notarization of ROG verification in connection with HCMS R&Os in notes litigation (0.1)	0.10	695.00	\$69.50



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06/11/2021	HRW	BL	Communications with client and notary for ROG verification in connection with HCMS R&Os in notes litigation (0.1)	0.10	695.00	\$69.50
06/11/2021	HRW	BL	Send opposing counsel ROG verification for HCMS R&Os in notes litigation (0.1)	0.10	695.00	\$69.50
06/11/2021	HRW	BL	Call with J. Morris and G. Demo re: HCMFA motion to amend answer in notes litigation (0.5)	0.50	695.00	\$347.50
06/11/2021	HRW	BL	Draft 30(b)(6) deposition notices for HCMFA and NPA for notes litigations (0.4)	0.40	695.00	\$278.00
06/14/2021	JAM	BL	E-mails w/ D. Rukavina re: discovery in the notes litigation against the Advisors (0.3).	0.30	1245.00	\$373.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			(0.7); Review HCRE discovery schedule in notes litigation (0.1).			
06/18/2021	JAM	BL	Review PwC Subpoena from Dondero (0.1); tel c. w/ J. Seery re: PwC subpoena from Dondero (0.1); e-mails w/ M. Aigen, J. Pomerantz re: PwC subpoena and financial statements (0.1).	0.30	1245.00	\$373.50

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06/23/2021	JAM	BL	Tel c. w/ H. Winograd re: amending the complaint to add new causes of action (0.2).	0.20	1245.00	\$249.00
06/23/2021	HRW	BL	Communicate with R. Half re: privilege review in notes litigation (0.2); Call with J. Morris re: amending complaints in notes litigation (0.1).	0.30	695.00	\$208.50



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			HCMFA proposed order (0.1); Call with J. Morris re: amending complaints in notes litigations (0.1); Research re: fraudulent transfer and other newly asserted claims for notes litigations (3.7); Draft amended complaint for notes litigation (3.2); Communicate with R. Half re: privilege review for notes litigations (0.1); Draft R&Os for HCMFA second RFPs (0.9).			
06/25/2021	IDK	BL	E-mails with G Demo re issues on Dondero conversion of HCMFA to holding company and impact on note litigation, and related background to same, including memo from Wilmer Hale on same.	0.40	1325.00	\$530.00
06/25/2021	JAM	BL	Tel c. w/ H. Winograd re: amended complaints for notes litigation (0.3).	0.30	1245.00	\$373.50
06/25/2021	GVD	BL	Correspondence with J. Morris and H. Winograd re preparation for amendment to the notes litigation	0.30	950.00	\$285.00



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06/25/2021	HRW	BL	Draft amended complaint for notes litigation (3.8); Call with J. Morris re: amended complaints for notes litigation (0.2); Research re: additional claims in notes litigation (2.0); Review HCMFA discovery and production (0.2); Send counsel for HCMFA first production (0.1); Review outstanding litigation critical dates (0.4).	6.70	695.00	\$4,656.50
06/27/2021	JAM	BL	Review/revise draft Amended Complaint against Dondero (1.2); e-mails w/ H. Winograd, G. Demo re: revised Amended Complaint against Dondero (0.3).	1.50	1245.00	\$1,867.50
06/27/2021	HRW	BL	Draft amended complaint for notes litigation (6.5); Research re: additional claims for amended claim in notes litigation (1.0).	7.50	695.00	\$5,212.50





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				Hours	Rate	Amount
06/28/2021	HRW	BL	Draft amended complaint for notes litigation (1.6); Research re: additional claims for amended claim in notes litigation (1.0); Review HCMFA R&Os and production to discovery requests (0.4); Send HCMFA R&Os and production to opposing counsel (0.1); Call with L. Canty re: HCMFA production (0.1); Draft R&Os to HCRE discovery requests in notes litigation (0.6).	3.80	695.00	\$2,641.00
06/29/2021	JNP	BL	Review opposition to motion to withdraw reference.	0.30	1295.00	\$388.50

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Highland Capital Management LP  
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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/30/2021	JAM	BL	E-mails w/ G. Demo, H. Winograd re: potential claims in amended complaint (0.2); e-mails w/ G. Demo re: issues concerning proposed amended complaint (0.1); review draft responses and objections to discovery requests tendered by HCM (0.4); review HCMFA motion for protective order (0.3); e-mails w/ J. Vasek, D. Rukavina, J. Pomerantz, G. Demo, H. Winograd re: HCMFA motion for protective order (0.2); tel c. w/ J. Seery re: issues concerning potential amended complaint (0.4).	1.60	1245.00	\$1,992.00
06/30/2021	GVD	BL	Correspondence with PSZJ team re revisions to amended note complaint	0.20	950.00	\$190.00

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**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

Board of Directors  
Highland Capital Management LP  
300 Crescent Court ste. 700  
Dallas, TX 75201

July 31, 2021  
Invoice 128292  
Client 36027  
Matter 00002  
**JNP**

RE: Postpetition

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**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 07/31/2021**

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/01/2021	JAM	BL	Further revisions to draft Amended Complaint (0.4); e-mails w/ G. Demo, H. Winograd, J. Pomerantz re: revisions to draft Amended Complaint (0.2).	0.60	1245.00	\$747.00
07/01/2021	GVD	BL	Review revisions to letter re conflicts of interest	0.40	950.00	\$380.00
07/01/2021	GVD	BL	Review amended complaint re notes litigation and correspondence re same	0.30	950.00	\$285.00





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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/02/2021	HRW	BL	Review supplemental production for HCMFA and NPA notes litigations (0.2); Send supplemental production for HCMFA and NPA notes litigations to opposing counsel (0.1).	0.30	695.00	\$208.50
07/03/2021	GVD	BL	Correspondence with J. Elkin re fraudulent conveyance actions in notes litigation	0.20	950.00	\$190.00
07/03/2021	JE	BL	Review additional transcripts and pleadings on fraudulent transfers; correspondence with Mr. Morris and Mr. Demo.	5.30	1195.00	\$6,333.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/07/2021	JNP	BL	Review Bankruptcy Court report and recommendation to District Court regarding withdrawal of reference.	0.10	1295.00	\$129.50
07/07/2021	JMF	BL	Review report and recommendations re notes adversary proceedings.	0.60	1050.00	\$630.00
07/07/2021	JAM	BL	E-mails w/ D. Rukavina re: proposed amended complaint (0.2).	0.20	1245.00	\$249.00



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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/08/2021	JNP	BL	Participate in hearing on motion to amend and motion to stay notes actions.	0.20	1295.00	\$259.00
07/08/2021	JNP	BL	Conference with J. Dubel regarding hearing on notes litigation.	0.20	1295.00	\$259.00
07/08/2021	JAM	BL	Court hearing on HCRE/HCMS motions to withdraw the reference and related matters (0.8); tel c. w/ J. Pomerantz re: court hearing (0.1).	0.90	1245.00	\$1,120.50

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